



Policy and Procedure Manual

Volume 2, Chapter 5 Purchasing and Inventory

Washington State WIC Nutrition Program

DOH 960-368

Effective June 15, 2022



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Purchasing and Inventory

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Section 1: Definitions

Definitions:

This table provides the item name as listed in policy, the definition, and the linked Federal regulation and WA State references(s). There are some items noted that aren't contained in this chapter but provided for clarity.

Item	Definition & Reference(s)
Acquisition Cost	The cost of the item(s) including the cost to prepare the item(s) for the intended use (taxes, duty, transit insurance, freight, installation, modifications, attachments, accessories, and auxiliary apparatus). This is known as the <i>per unit acquisition cost</i> . 2 CFR 200.1
Allowable Costs	Costs that are allowed with WIC, BFPC, and FMNP funds. Volume 2, Ch 4 – Allowable Costs addresses common allowable costs and a methodology to determine allowability. 2 CFR 200.403, .404, & .405
Allocable / Allocation	The ability to assign a cost or a group of costs to one or more cost objectives in reasonable proportion to the benefit provided or other equitable relationship. 2 CFR 200.1
Allocable Costs	A cost is allocable if the goods and services involved are chargeable or assignable to the program. 2 CFR 200.405
Blanket Purchase Agreement (BPA)	A schedule contract to fill repetitive needs for supplies or services. The appropriate purchasing threshold and process must be followed. FAR 8.405-3
Capital Assets	Have a useful life of more than 1 year and include; land, building, equipment, and intellectual (software) properties whether obtained by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases and changes that increase the material value or useful life. 2 CFR 200.1 & .443
Capital Expenditures	Costs to purchase capital assets or to make changes that increase the material value or useful life of the capital asset. 2 CFR 200.1
Contract	A formal, legally enforceable agreement between a buyer and a seller that establishes legally binding obligation for the seller to furnish goods or services and for the buyer to compensate the seller. 2 CFR 200.1
Electronic Devices	Physical and mechanical components of computers, such as desktops, laptops, monitors, tablets, and cell phones. Refer to <i>computing devices</i> in 2 CFR 200.1
Equipment	Items that have a per unit acquisition cost of \$5,000 or more with a useful life of more than one year. 2 CFR 300.313 & .439

Federal Award Identification Number (FAIN)	The unique ID for each financial assistance award. This number changes with the award and is found on the notice of award (NOA).
Formal Purchase Process	A formal method for securing and managing services, supplies, or equipment that meet the Formal Purchase Threshold. For the purpose of this chapter, it includes procurement by sealed bids and procurement by competitive bids. 2 CFR 200.320(b) Note: Purchases below the Formal Purchase Threshold may follow the formal purchase procedures.
Formal Purchase Threshold	The per unit acquisition threshold amount at or above the amount that requires the use of the Formal Purchase Procedures. The threshold is at or above \$250,000. Contact the LPC for guidance before beginning this process. 2 CFR 200.1 & 48 CFR part 2 , subpart 2.1
Free and Open Competition	The concept that all vendors have the same opportunity to compete for the contract. Purchase procedures must never unduly restrict or eliminate competition.
Inventory	For the purposes of this chapter, inventory refers to all equipment and small and attractive supplies purchased by WIC funds with an acquisition cost of >\$300.
Item	For the purpose of this chapter, the term “item” is referring to the per unit acquisition cost. 2 CFR 200.1
Micro Purchase Process	An informal method for securing and managing services, supplies, or equipment that meet the Micro Purchase Threshold. 2 CFR 200.1 , .320(a)(1) & 48 CFR part 2 , subpart 2.1
Micro Purchase Threshold	The acquisition of supplies or services, with a combined total amount below \$10,000. Quotes are not required if the price is considered reasonable to the local agency. 2 CFR 200.1 & 48 CFR part 2 , subpart 2.1 Note: Vehicles and electronic devices must follow the Small Purchase Process, regardless of cost
Nominal Value Threshold (NVT)	The maximum cash value of an incentive item (also referred to as NVT). - The Outreach NVT is \$1.00 per item. - The Nutrition Education and Breastfeeding NVT for is \$5.00 per item.
Peripherals	Includes keyboard, mouse, scanner, printers, webcam, headsets, modem, switches, cabling, card reader, and signature pad.

Procurement	<p>The process of purchasing supplies, services, and equipment. There are two types of procurements - formal and informal procurements. The purchasing threshold dictates which procurement to use.</p> <p>Note: A procurement will be referred to as a purchase this chapter.</p>
Purchasing Threshold	<p>The dollar value that determines which purchase method to use to purchase and manage goods or services. There are three purchasing thresholds: <i>micro</i>, <i>small (informal)</i>, and <i>formal</i>. Conduct the purchase at the most restrictive level (federal, state, or local). 2 CFR 48 Subpart 2.1</p>
Reasonable Costs	<p>A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under circumstances prevailing at the time the decision was made to incur the cost. 2 CFR 200.404</p>
Respondent	<p>The entity that responds to the solicitation. May also be referred to as a bidder, offerer, vendor, proposer or contractor.</p>
Responsible	<p>A respondent who is capable of successfully performing under the terms, conditions and specifications of a contract.</p>
Responsive	<p>A respondent who submits a response that conforms to the terms, conditions and specifications of the solicitation.</p>
Risk Level (RL)	<p>Depending on the risk level assigned by the Dept of Health Fiscal Monitoring Unit, an agency may be required to provide additional back-up documentation noted on the A-19 reimbursement requests. Refer to the FMU A19 Documentation Standardization Matrix for specific details.</p>
Services	<p>Purchases for services such as leased copy machines and janitorial contracts.</p>
Small and Attractive Items	<p>Items that attract theft. Items include, but are not limited to, electronic devices.</p>
Small Purchase Threshold	<p>The per unit acquisition threshold amount below which allows the use of the Small Purchase Procedures. The threshold amount is \$249,999 or less. 2 CFR 200.1 & 48 CFR part 2, subpart 2.1</p>
Small Purchase Process	<p>An informal method for securing and managing supplies, services and equipment that are at or below the Small Purchase Threshold. When used, price or rate quotes are obtained from three (3) or more qualified vendors. Quotes must be documented and available for review. 2 CFR 200.320(a)(2)</p> <p>Note: Vehicles and electronic device purchases must follow this process.</p>

Noncompetitive Purchase	Describes a rare condition in the purchasing environment. This type of purchase is only permitted under limited circumstances and requires prior approval from the State WIC Office. 2 CFR 200.320(c)
Solicitation	A document prepared by the purchaser. It has a clear and accurate description of the technical requirements and specifications for the material, product or service to be purchased. It must identify all of the contract provisions required by federal purchasing regulations, requirements, terms, conditions and specifications that a vendor must fulfill and all factors to be used in evaluating a quote, bid or proposal.
Supplies	Items that have a per unit acquisition cost of less than \$5,000. 2 CFR 200.1 & .314
WIC Funds	For the purpose of this chapter, WIC funds refer to WIC federal funds, Breastfeeding Peer Counselor (BFPC) funds, and Farmers Market Nutrition Program (FMNP) funds.

Section 2: Purchasing

POLICY: Order Supplies from the State WIC Office

Staff must order the following supplies through the state WIC office, at no charge:

- Hematology supplies
- Breast pumps and supplies

Note: Before purchasing nutrition education, program and outreach materials from an outside source, please review resources available at no cost at myPRINT.wa.gov.

PROCEDURE:

Staff:

- A. Contact WICHematology@DOH.WA.GOV to obtain an order form.
 1. Complete and submit according to the instructions on the form.
 2. Refer to [Volume 1, Chapter 10 – Hematology](#).
- B. Complete and submit the [Breast Pump and Supplies Order form](#) according to the instructions on the form.
 1. Contact WICBreastPumps@DOH.WA.GOV for additional assistance.
 2. Refer to [Volume 1, Chapter 15 – Breastfeeding](#): “Order Breast Pumps, Pump Kits and Breast Pump Supplies”.
- C. Review nutrition education, program and outreach materials at myPRINT.wa.gov to determine whether there are materials already available at no cost that will meet your needs.
 1. Refer to [Volume 1, Chapter 16 - Nutrition Education](#).
 2. Refer to [Volume 1, Chapter 22 – Issue WIC Food Benefits](#).
 3. Refer to Volume 2, Chapter 9 - Outreach.

Note: If you receive the wrong item or need to return unused items, please call 1-800-841-1410 and ask to speak with the Client Services Section Administrative Assistant for guidance.

POLICY: Determine Allowability and Need for Prior Approval

Staff must use the [Allowable Cost & Prior Approval Decision Tree Chart](#) to determine if the purchase is allowable and if prior approval is required before using WIC federal funds for purchases. (2 CFR 200.[403](#), [.404](#), [.405](#), [.407](#) & [.439\(b\)](#))

PROCEDURE:

Staff:

- A. Review the [Order Supplies from the State WIC Office](#) policy to ensure items are not offered by the State WIC office at no charge.
- B. Refer to [Volume 2, Chapter 4 Allowable Costs](#) - Appendix for common allowable costs.
- C. Use the [Allowable Cost & Prior Approval Decision Tree Chart](#) to determine the allowability, need for prior written approval, for the proposed purchase.

Note: Local agency purchasing policies may be stricter than the State or Federal policies.

- D. Consult with the purchasing specialist at the local agency to determine allowability, the need for prior written approval, and the need to request additional funding.
 - 1. Document rationale for allowability and the need prior written approval.
 - 2. File with the procurement documents.
- E. If prior approval is necessary and/or need additional funding, complete the [Purchasing Approval and/or Additional Funding Request form](#) and submit to the Local Program Consultant (LPC) mailbox at WICLPC@doh.wa.gov for approval.
- F. Follow purchasing procedures in this chapter.

POLICY: Code of Conduct

The local agency must write and follow a written code of conduct policy to guide staff who purchase and manage supplies, services, and equipment with WIC funds. ([2 CFR 200.318\(c\)](#))

PROCEDURE:

The purchasing specialist at the local agency:

- A. Develops a written code of conduct that applies to all staff who purchase and manage supplies, services, and equipment with WIC funds. The policy must:
 - 1. Set a nominal value threshold for incentives staff may accept.
 - 2. Prohibit staff from asking for incentives, gifts, travel packages, goods and services from vendors.
 - 3. Prohibit staff from accepting incentives beyond the nominal value threshold from likely vendors.
 - 4. Prohibit staff from being a part of the selection, award or administration process of any purchase that they have a real or perceived conflict of interest.
 - 5. Include disciplinary actions in the event the standards are violated.
 - 6. Include a local agency review and revision schedule.

POLICY: Purchase Procedures

Staff must follow written purchasing procedures that describe how to:

- Purchase supplies, services, and equipment when using WIC funds, and;
- Adhere to federal, state, local, and tribal laws and regulations. ([2 CFR 200.318](#) & [.334](#)) ([RCW 39.26](#)).

PROCEDURE:

The purchasing specialist at the local agency develops written purchasing procedures that:

- A. State all purchases of supplies, services, and equipment must follow the purchasing procedures.
- B. Refer to the local agency's written [Code of Conduct](#) policy.
- C. Refer to the federal, state, local, and tribal laws and regulations.
- D. Include a process that:
 1. Ensures free and open competition, transparency in transactions, and comparability.
 2. Ensures a cost or price analysis is performed for all purchases above the Small Purchase threshold.
 3. Avoids the purchase of unnecessary or duplicative items.
 4. Avoids breaking the purchase into smaller purchases to avoid the correct purchase method.
 5. Includes training for staff who purchase and manage supplies, services, and equipment, including:
 - a. How soon after hire/placement in position training occurs.
 - b. Annual training requirements and documentation.
- E. Include contracts that are only awarded to responsible contractors who can demonstrate:

1. Contractor integrity
 2. Compliance with public policy
 3. Record of past performance
 4. Financial and technical resources
- F. Include written procedures for all parts of the purchase transaction:
1. Solicitations must include a clear and accurate description of the material, product or service, including essential characteristics
 2. Identify all requirements that must be fulfilled and factors to be used when evaluating bids or proposals
- G. Include records are kept that document all purchase activities:
1. Rationale for the method of purchase
 2. Selection of contract type
 3. Contractor selection or rejection
 4. Basis for contract price
- H. Include record retention schedule.
- I. Include a local agency review and revision schedule.

POLICY: Purchase Supplies, Services, and Equipment

Staff must determine, when purchasing supplies, services, or equipment, if the purchase is:

- Available from the State WIC Office;
- Allowable;
- Needs prior approval, and;
- Follows the appropriate purchasing procedures.

Note: Do not break the purchase into smaller amounts or into multiple purchases to meet the micro-purchase or small purchase threshold.

If additional funding is needed, use the [Purchasing Approval and/or Additional Funding Request form](#) and submit to the Local Program Consultant (LPC) mailbox at WICLPC@doh.wa.gov.

PROCEDURE:

Staff:

- A. Refers to the [Order Supplies from the State WIC Office](#) policy to determine if the items are available at no cost from the State WIC office.
- B. Refers to the [Determine Allowability and Need for Prior Approval](#) policy to determine if items are allowable and if prior approval is needed. Work with purchasing specialist at the local agency to follow local policies on allowability for purchases.
 1. If items are unavailable from the State WIC office, the purchase is determined allowable, and prior approval is granted (when required):
 - a. Follow the [Micro Purchase Process](#) policy when the total combined acquisition costs are \$10,000 or less, except for vehicles and electronic devices.
 - b. Follow the [Small Purchase Process](#) policy for:
 - 1) Services and equipment when the per unit acquisition cost is more than \$10,000 but less than \$250,000.
 - 2) Supplies when the total combined acquisition cost is more than \$10,000 but less than \$250,000.

3) Vehicles and electronic devices, regardless of cost.

- c. Follow the [Formal Purchase Process](#) policy when the per unit acquisition cost is \$250,000 or more.

Note: The purchase price and maintenance of supplies, services, and equipment must be prorated among all programs using the supplies, services and equipment.

POLICY: Micro Purchase Process

Staff may use the Micro Purchase Process to purchase supplies or services with a combined total amount that is less than \$10,000. The local agency may choose to follow the Small or Formal Purchase Processes. ([2 CFR 200.320\(a\)\(1\)](#))

Note: Do not break the purchase into smaller amounts or into multiple purchases to meet the micro-purchase or small purchase threshold.

Regardless of price, the Small Purchase Process must be followed to purchase vehicles and electronic devices.

PROCEDURE:

Staff:

- A. Refers to the [Purchase Supplies, Services, and Equipment](#) policy.
- B. Refers to the local agency's Purchasing Procedures policy for local procurement requirements.
- C. Ensures multiple vendors are used for micro purchases and purchases are equitably distributed among qualified vendors.
- D. Refers to [Volume 2, Chapter 7 – Record Retention](#) for agency fiscal and accounting records retention requirements.

Note: A best practice is to obtain a quote to minimize risk with an audit. This is not required when the local agency determines a price is considered reasonable. Refer to the [Allowable Cost & Prior Approval Decision Tree Chart](#).

POLICY: Small Purchase Process

Staff must use the Small Purchase Process when purchasing supplies, services, equipment, or other property with an acquisition cost that is more than \$10,000 but less than \$250,000. Staff may choose to use the Formal Purchase Process. ([2 CFR 200.320\(a\)\(2\)](#))

Vehicle and electronic device purchases must follow this process.

All purchases require new quotes.

Note: Do not break the purchase into smaller amounts or into multiple purchases to meet the micro-purchase or small purchase threshold.

PROCEDURE:

Staff:

- A. Refer to the [Purchase Supplies, Services, and Equipment](#) policy.
- B. Refer to the local agency's Purchasing Procedures policy to proceed with the purchase.
- C. Write the specification for the purchase. Do not use a vendor's specification as this does not ensure free and open competition. The specification should include:
 1. Item name with a clear and accurate description.
 2. Essential characteristics.
 3. Delivery needs.
 4. Any other criteria to be considered for the purchase/service.
- D. Enter specifications into the [Small Purchase Request for Quote form](#).
- E. Contact at least three vendors likely to be responsive to the quote request.
 - It is acceptable to call for the quote or to send the [Small Purchase Request for Quote form](#) to the vendor.
 - If calling, follow up by sending the [Small Purchase Request for Quote form](#) to the vendor to complete, sign and return.

- F. Follow the [Formal Purchase Process](#) if the quotes exceed the small purchase threshold (< \$250,000 or more restrictive local/agency threshold).
- G. Identify the most responsible vendor with the most responsive quote with the lowest price.
1. The most responsible vendor is one who:
 - a. Is not suspended or debarred for contracting.
 - 1) Search [SAM.gov](#) or [FAPIS.gov](#) for suspended or debarred vendors.
 - 2) Search using the DUNS number or FEIN for the vendor.
 - 3) Absence of information indicates no suspension or debarment.
 - 4) Screen print the results and keep with purchase documents.
 - b. Has a history of good business practices.
 2. The most responsive quote is the quote that meets all or most of the specifications.
 3. The lowest price includes the following (and is called the per unit acquisition cost):
 - a. The price of supply, service, equipment or property
 - b. Applicable taxes
 - c. Shipping and handling charges
 - d. Installation expenses
 - e. Indirect rates or cost allocation rate
 - f. Any other applicable costs to obtain the supply, service, equipment or property.
- H. Document on the [Small Purchase Request for Quote form](#) the rationale for choosing or not choosing each vendor. If not going with the lowest quote, an explanation must be documented.
- Note:** Notifying vendors of the award decision is best practice.
- I. Proceed to purchase.

- J. Refer to [Volume 2, Chapter 7 – Record Retention](#) for agency fiscal and accounting records retention requirements.

POLICY: Formal Purchase Process

Staff must work with the State WIC office to use the Formal Purchase Process. The Formal Purchase Process is used when purchasing services, equipment, or other property with a per unit acquisition cost that is \$250,000 or more. ([2 CFR 200.320\(b\)](#))

Note: The local agency may set a more restrictive formal purchasing threshold.

Note: Do not break the purchase into smaller amounts or into multiple purchases to meet the micro-purchase or small purchase threshold.

PROCEDURE:

Staff:

- A. Contact the Local Program Consultant for guidance with this type of purchase.
- B. Refer to the [Purchase Supplies, Services, and Equipment](#) policy.
- C. Refer to the local agency's purchasing procedures policy to proceed with the purchase.
- D. Refer to [Volume 2, Chapter 7 – Record Retention](#) for agency fiscal and accounting records retention requirements.

POLICY: Purchase and Inventory Electronic Devices

Staff must:

1. Follow the [Small Purchase Process](#) policy outlined in this chapter.
2. Comply with:
 - a. The following policies in [Volume 2, Chapter 8 – Electronic Devices, Security, and Service Interruption Plan](#):
 - The minimum IT requirements in the “Provide WIC Services” policy.
 - The cell phone use requirements in the “Cell Phone Use” policy.
 - The policies to safeguard devices after purchase in Section 3.
 - b. The policies to safeguard participant information in [Volume 1, Chapter 25 – Legal Considerations and Confidentiality](#), Section 5: Safeguarding Client Information after purchase.

Note: [OFM Policy 30.40.20](#) considers all electronic devices as small and attractive items. It also requires that electronic devices with a total per unit acquisition cost of \$300 or more are added to the inventory log and be inventoried annually. Review the OFM policy for detailed information.

PROCEDURE:

Staff:

- A. Refer to the [Purchase Supplies, Services, and Equipment](#) policy in this chapter.
- B. Refer to the local agency’s Purchasing Procedures policy for local procurement requirements.
- C. Follow the [Small Purchase Process](#), even if the per unit cost is \$10,000 or less.
- D. Add all electronic devices to the agency’s inventory list and inventory annually.
 - Refer to the [Inventory](#) policy in this chapter for mandatory inventory elements.

- E. Refer to “Staff Access to Software and Data” policy [Volume 2, Chapter 8 – Electronic Devices, Security, and Service Interruption Plan](#) for information about activating Windows and Cascades access.
- F. Refer to the Information Technology Equipment section of [OFM 30.50.10](#) for replacement schedules for electronic devices.
- G. Refer to [Volume 2, Chapter 7 – Record Retention](#) for agency fiscal and accounting records retention requirements.

Note: Upon purchase, the electronic device becomes the property of the local agency. State WIC IT Service Desk can’t provide IT assistance. State WIC staff will provide Cascades system support.

POLICY: Purchase and Maintain Vehicles

Staff must:

1. Obtain prior written approval from the State WIC office before purchasing vehicles ([2 CFR 200.439](#)), regardless of price.
2. Follow the Small Purchase Process, regardless of price.
3. Prorate the purchase price and maintenance of the vehicle among all programs using the vehicle.

Note: Costs incurred for maintaining the vehicle to keep it in an efficient operating condition are allowable. Insurance and registration costs are allowable. Maintenance includes fuel, oil changes, tire rotations, new tires, windshield replacements, tune-ups, etc. ([2 CFR 200.452](#))

PROCEDURE:

Staff:

- A. Refer to the [Purchase Supplies, Services, and Equipment](#) policy.
- B. Complete the [Purchasing Approval and/or Additional Funding Request form](#) and Itemization Worksheet and submit to the Local Program Consultant (LPC) mailbox at WICLPC@doh.wa.gov to request additional funds, if needed, and for approval.
- C. Complete the following once approved for purchase:
 1. Refer to the local agency's Purchasing Procedures policy to proceed with the purchase.
 2. Follow the [Small Purchase Process](#) even when the total cost is \$10,000 or less.
 3. Submit a copy of the vehicle registration to the LPC for entry into the State office Vehicle Inventory log.
 4. Add the vehicle to the agency's inventory list.
 5. Include vehicle maintenance, license and registration costs on the Budget Summary tab of the annual Local Agency Budget Workbook.

6. Refer to [Volume 2, Chapter 7 – Record Retention](#) for agency fiscal and accounting records retention requirements.

POLICY: Purchase Capital Assets, Land and Improvements

Staff must work with the State WIC office before purchasing capital assets. Capital assets include buildings, land, and improvements to buildings or land, that materially increase their value or useful life that cost more than \$5,000. When a multi-phased capital improvement project is planned, the total cost of the project must be submitted as a unit for approval. This also includes rental costs of real property and equipment. ([2 CFR 200.439](#) and [.465](#)).

Notes:

- Do not break the purchase into smaller amounts or into multiple purchases to meet the micro-purchase or small purchase threshold. When a multi-phased capital improvement project is planned, the total cost of the project must be submitted as a unit for approval.
- Maintenance and renovations completed on leased property is subject to full or partial repayment when the lease is terminated before the depreciation of the improvements has occurred.
- Costs incurred for improvements which add to the permanent value of buildings and equipment or appreciably prolong their extended life must be treated as capital expenditures.

PROCEDURE:

Staff:

- A. Contact the Local Program Consultant for guidance with this type of purchase.
- B. Refer to the [Purchase Supplies, Services, and Equipment](#) policy.
- C. Refer to the local agency's Purchasing Procedures policy to proceed with the purchase.
- D. Refer to [Volume 2, Chapter 7 – Record Retention](#) for agency fiscal and accounting records retention requirements.

Section 3: Inventory and Disposal

POLICY: Inventory

Staff must:

- Inventory all equipment, vehicles purchased with WIC funds upon purchase and every two years thereafter. Small and attractive items must be inventoried annually. ([2 CFR 200.313\(d\)\(1\)&\(2\)](#) and OFM [30.40](#))
- Develop and maintain a local agency inventory policy.

PROCEDURE:

Staff:

- A. Develop a written inventory policy to identify:
 1. Maintenance procedures to keep property in good condition.
 2. Safeguards to prevent loss, damage, or theft of the property.
 3. Inventory, log maintenance and reconciliation procedures.
- B. Develop and maintain an inventory log for equipment and vehicles purchased with WIC funds. A [sample inventory log](#) is in the Appendix. The log must contain:
 1. Description of item.
 2. Serial or other identifying number.
 3. Source of funding (including FAIN).
 4. Title holder.
 5. Purchase date.
 6. Purchase price.
 7. Percentage of WIC funds used to purchase item.
 8. Location of the item.
 9. Use and condition of the item.
 10. Disposal/transfer date, disposition, and sale price, if appropriate.

Note: If the local agency does not have equipment purchased with WIC funds, it must still have a written inventory policy and maintain an inventory log.

- Indicate on the log *“No inventory purchased with WIC funds”* and the date.
- Reconcile annually or every two years with the same note, as appropriate.

C. Refers to [Volume 2, Chapter 7 – Record Retention](#) for inventory records retention requirements.

POLICY: Lost, Stolen or Destroyed Electronic Devices (on loan from DOH)

Staff must:

- Immediately report any stolen state-owned electronic equipment to their local police.
- Report lost, stolen, or destroyed state-owned electronic equipment to the State WIC IT Service Desk and the Local Program Consultant (LPC) within one business day.
- Provide a copy of police report to State WIC IT Service Desk as soon as available.
- Work with the LPC on a plan for notifying participants about the breach in security if participant information was on the equipment.
- See [Volume 1, Chapter 25 - Legal Considerations and Confidentiality](#) for more information.
- Report the plan to correct the situation which allowed equipment to be stolen or lost.

PROCEDURE:

Staff:

- A. Contact local police when state-owned electronic equipment is stolen and file a police report.
 1. Specify the DOH tag number or serial tag number and description of equipment in the police report.
 2. Contact the State WIC IT Service Desk at DOHPCHWICServiceDesk@doh.wa.gov for inventory numbers or physical details on the equipment for the police report, if needed.
- B. Report lost, stolen, or destroyed electronic equipment immediately or within one business day to the State WIC IT Service Desk.
 1. Describe the circumstances of the lost, stolen, or destroyed equipment. Fax or email a copy of the police report to State WIC IT Service Desk as appropriate.
 2. Coordinate with the State WIC IT Service Desk to receive replacement equipment if appropriate.

3. Update the state-owned electronic equipment inventory. State WIC IT Service Desk staff will send the form if needed.
- C. Send an email to WICLPC@doh.wa.gov with information about lost, stolen, damaged, or destroyed equipment (item description, date of occurrence, etc.). Work with the LPC on a plan for participant notification if computer equipment is stolen.
- D. If damaged, include a repair estimate, or a statement from the coordinator that the item is too costly to repair.
1. If lost or destroyed include a statement from the coordinator detailing the circumstances.
 2. Include appropriate documentation from the police, fire department, etc.
 3. Include a statement of precautionary steps the agency will take to safeguard electronic devices.

POLICY: Lost, Stolen, Damaged or Destroyed Electronic Devices (local agency owned)

Staff must notify the State WIC office within 24 hours if there is a possible breach of participant information.

PROCEDURE:

Staff:

- A. Notify the State WIC office within 24 hours if there is a possible breach of participant documentation.
 - 1. What happened.
 - 2. Date of occurrence.
- B. Refer to the following chapters for additional guidance:
 - 1. [Volume 1, Chapter 15 – Breastfeeding](#)
 - 2. [Volume 1, Chapter 25 - Legal Considerations and Confidentiality](#)
 - 3. [Volume 2, Chapter 8 – Electronic Devices, Security and Service Interruption Plan](#)
- C. Follow the local agency process to report lost, stolen, damaged, or destroyed electronic devices.

Note: Upon purchase, the electronic device becomes the property of the local agency.

POLICY: Vehicles Stolen or Damaged Beyond Repair

Staff must notify the Local Program Consultant (LPC) in writing when a vehicle is stolen or damaged beyond repair.

PROCEDURE:

Staff:

- A. Report stolen vehicle to local police.
- B. Call insurance company for additional guidance.
- C. Notify the LPC in writing when a vehicle is stolen or damaged beyond repair:
 1. What happened.
 2. Date of occurrence.
 3. Police report.
 4. Insurance company documentation.
- D. Update the inventory log.
- E. Complete the [Purchasing Approval and/or Additional Funding Request form](#) and Itemization Worksheet and submit to the LPC mailbox at WICLPC@doh.wa.gov to request additional funds, if needed, and for approval to replace the vehicle.
- F. Refer to [Volume 2, Chapter 7 – Record Retention](#) for inventory records retention requirements.

POLICY: Significant Damage to Capital Assets, Land and Improvements

Staff must notify the Local Program Consultant (LPC) in writing when there is significant damage to Capital Assets, Land, and Improvements.

Significant damage is defined as partial to total loss of the asset.

PROCEDURE:

Staff:

- A. Report damage to local police, if needed.
- B. Call insurance company for additional guidance.
- C. Notify the LPC by email at WICLPC@doh.wa.gov with the following:
 - 1. What happened.
 - 2. Date of occurrence.
 - 3. Police report.
 - 4. Insurance company documentation.
- D. Refer to [Volume 2, Chapter 7 – Record Retention](#) for inventory records retention requirements.

POLICY: Disposal of Supplies (local agency owned)

Staff must dispose of supplies according to the procedure below.

Upon purchase, supplies become the property of the local agency. Disposal procedures depend on the fair market value of the remaining supplies. ([2 CFR.200.314](#), [.453](#) & [.313\(e\)](#))

PROCEDURE:

Staff:

- A. Dispose of supplies according to the local agency policy when the total combined fair market value of the supplies is less than \$5,000.
- B. Choose between the following options when the total combined fair market value of the supplies is \$5,000 or greater:
 1. Transfer the supplies to other WIC local agencies.
 2. Keep the supplies for another federal program within the agency.
 3. Sell the supplies. Proper sales procedures must be established to ensure the highest possible return. Contact the Local Program Consultant by email at WICLPC@doh.wa.gov for guidance on returning the funds to the State WIC office.
- C. Update the inventory log.
- D. Refer to [Volume 2, Chapter 7 – Record Retention](#) for inventory records retention requirements.

POLICY: Disposal of Equipment (local agency owned)

Staff must dispose of equipment according to the procedure below.

When equipment purchased with WIC funds is no longer needed, staff must determine the current per unit fair market value of the equipment and follow disposal procedures. ([2 CFR.200.313\(e\)](#)).

PROCEDURE:

Staff:

- A. Determine the current per unit fair market value of the equipment.
 1. When the per unit fair market value is \$5,000 or less:
 - a. The item may be retained, sold or otherwise disposed of with no further obligation to the State WIC office.
 2. When the per unit fair market value is more than \$5,000:
 - a. Submit a written request for disposal instructions to WICLPC@doh.wa.gov.
 - b. The State WIC office will provide written instructions within 30 days of request.
 - c. The local agency will be directed to transfer, keep, or sell the equipment:
 - 1) Transfer the equipment to other WIC local agencies.

Note: If the local agency is instructed to transfer the equipment and the equipment was not purchased with 100% WIC funds, the State WIC office will compensate the local agency for its percentage of the current fair-market value.
 - 2) If kept, the local agency is required to reimburse the State WIC office for the percentage of the current fair market value the State WIC office provided for the purchase of the equipment.

-
- 3) If sold, the local agency is required to reimburse the State WIC office for the percentage of the current fair market value the State WIC office provided for the purchase of the equipment.
 - i. The local agency may deduct and retain from the amount returned to the State WIC office \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.
 - ii. Proper sales procedures must be established to ensure the highest possible return.
- B. Update the local agency inventory log, to include (all applicable items):
1. Retained – indicate date transferred to another federal program in agency and which program.
 2. Sold – indicate sold date and to whom.
 3. Disposed – indicate disposal date and how disposed.
- C. Refer to [Volume 2, Chapter 7 – Record Retention](#) for inventory records retention requirements.

Section 4: Appendix

A-19 Documentation Matrix



Washington State Department of Health
A-19 Documentation Matrix

This is the backup documentation required based on the determined risk level. Please ensure the *detailed* GL expenditure report clearly aligns with the A19 form. **More supporting documentation may be requested by programs at any time due to programmatic requirements regardless of risk category.**

Expenditure Category	Low-Risk	Moderate-Risk	High-Risk
<p>Salaries and Benefits</p>	<p>A-19 and a <i>detailed</i> GL expenditure report for all employees who are charged to the grant for the period with the following information:</p> <ul style="list-style-type: none"> • Salaries & Wages • Employee name • Employee rates of pay • Hours worked <p>Note: Salaries and benefits must be broken out as separate line items.</p>	<p>A-19 and a <i>detailed</i> GL expenditure report for all employees who are charged to the grant for the period with the following information:</p> <ul style="list-style-type: none"> • Salaries & Wages • Employee name • Employee rates of pay • Hours worked <p>Note: Salaries and benefits must be broken out as separate line items.</p>	<p>A-19 and a <i>detailed</i> GL expenditure report for all employees who are charged to the grant for the period with the following information:</p> <ul style="list-style-type: none"> • Salaries & Wages • Employee name • Employee rates of pay • Hours worked <p>AND</p> <ul style="list-style-type: none"> • Time Sheets for all staff direct charging to the award <p>Note: Salaries and benefits must be broken out as separate line items.</p>

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Washington State Department of Health
A-19 Documentation Matrix

Expenditure Category	Low-Risk	Moderate-Risk	High-Risk
Equipment (\$5,000 or more)	A-19 and a <i>detailed</i> GL expenditure report that provides vendor name and amount Note: Pre-approval documentation must be provided	A-19 and a <i>detailed</i> GL expenditure report that provides vendor name, amount AND <ul style="list-style-type: none"> Item Description Note: Pre-approval documentation must be provided	A-19 and a <i>detailed</i> GL expenditure report that provides vendor name, amount, item description AND <ul style="list-style-type: none"> Invoice Supporting documentation reflecting authorizing official's approval.
Materials, Supplies, and Other	A-19 and a <i>detailed</i> GL expenditure report that provides: <ul style="list-style-type: none"> Vendor Name Item description Cost of item Note: If the entity has a petty cash fund, they must supply 100% of the supporting documentation.	A-19 and a <i>detailed</i> GL expenditure report that provides: <ul style="list-style-type: none"> Vendor Name Item description Cost of item AND Invoices for transactions over \$1,000 Note: If the entity has a petty cash fund, they must supply 100% of the supporting documentation.	A-19 and <i>detailed</i> GL expenditure report that provides: <ul style="list-style-type: none"> Vendor Name Item description Cost of item AND Invoices for transactions over \$200. Note: If the entity has a petty cash fund, they must supply 100% of the supporting documentation
Travel	A-19 and a <i>detailed</i> GL expenditure report that provides:	A-19 and a <i>detailed</i> GL expenditure report that provides:	A-19 and a <i>detailed</i> GL expenditure report that provides:

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Washington State Department of Health
A-19 Documentation Matrix

Expenditure Category	Low-Risk	Moderate-Risk	High-Risk
	<ul style="list-style-type: none"> Employee name <p>Note: Pre-approval documentation from DOH for any out of state travel must be provided.</p>	<ul style="list-style-type: none"> Employee name <p>AND</p> <ul style="list-style-type: none"> Travel expense form* All itemized receipts <p>* Travel expense form should include employee signature, supervisor approval, mileage, and purpose.</p> <p>Note: Pre-approval documentation from DOH for any out of state travel must be provided.</p>	<ul style="list-style-type: none"> Employee name Travel expense form* All itemized receipts <p>AND</p> <p>Pre-approval required for any flights and overnight stays.</p> <p>*Travel expense form should include employee signature, supervisor approval, mileage and purpose.</p> <p>Note: Pre-approval documentation from DOH for any out of state travel must be provided.</p>

Expenditure Category	Low-Risk	Moderate-Risk	High-Risk
<p>Contracts and Sub-Sub recipients</p>	<p>A-19 and a <i>detailed</i> GL expenditure report that provides:</p> <ul style="list-style-type: none"> Contractor/Subrecipient Name 	<p>A-19 and a <i>detailed</i> GL expenditure report that provides:</p> <ul style="list-style-type: none"> Contractor/Subrecipient Name <p>AND</p> <ul style="list-style-type: none"> Invoices for individual transactions over \$1,000.00 	<p>A-19 and a <i>detailed</i> GL expenditure report that provides:</p> <ul style="list-style-type: none"> Contractor/Subrecipient Name <p>AND</p> <ul style="list-style-type: none"> Invoices for individual transactions over \$200.00.

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Washington State Department of Health
A-19 Documentation Matrix

NOTE:

Indirect costs included on A19s **must** include verification of the following:

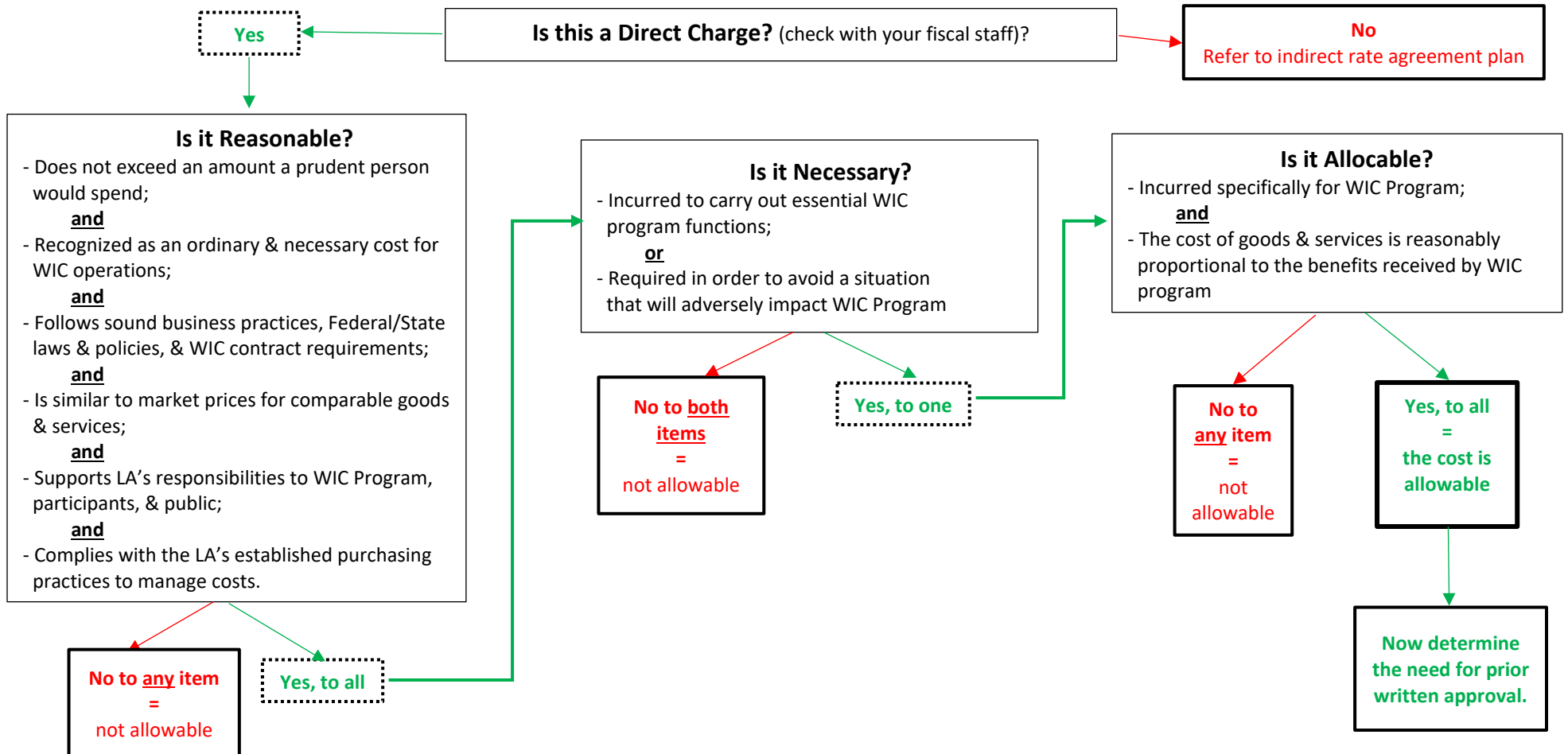
- Indirect plan is current and on file with DOH
- Indirect rate is being applied accurately to allowable expenditures
- If the indirect cost rate plan has expired, no indirect costs can be charged

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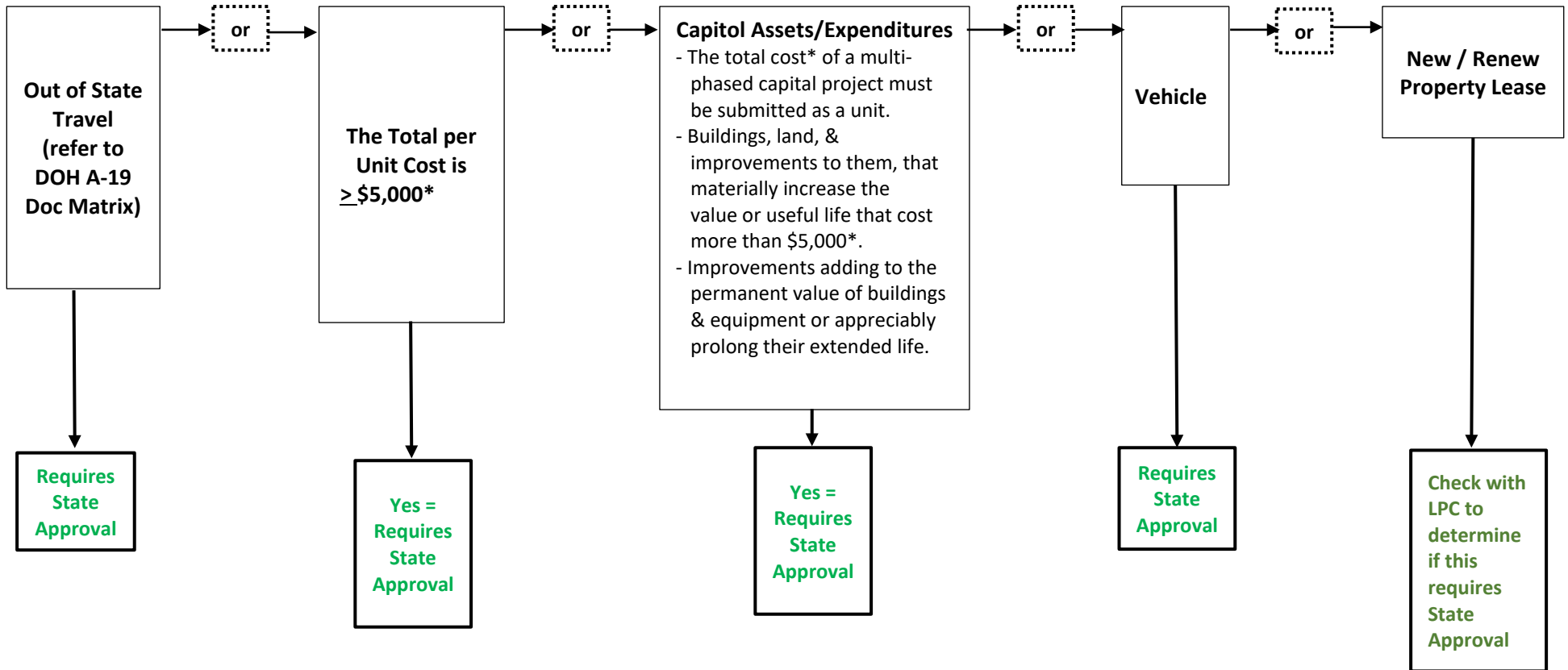
Allowable Cost & Prior Approval Decision Tree

Purpose: To help determine if purchase is allowable and identify if cost requires prior written approval.

Allowability = the purchase must be necessary + reasonable + allocable + direct charge



Requires Prior Written Approval
Risk Level / Cost / Type



* The total per unit (acquisition) cost = per item cost + taxes + shipping + installation + other fees

Purchasing Approval and/or Additional Funding Request

Purpose: Use this form to obtain State approval to purchase goods or services and/or to request additional funds for purchases or staffing needs. When requesting approval for or additional funds for WIC and BFPC, use separate forms. Use the Itemization Worksheet when there are multiple requests.

Agency Information	
Agency:	DOH Assigned Risk Level
Contact:	<input type="checkbox"/> Low
Contact Title:	<input type="checkbox"/> Medium
Contact Phone/Email:	<input type="checkbox"/> High
Authorized Caseload: Certifier/clerk FTE: Coordinator/Admin FTE:	
RD FTE: DBE FTE: PCL FTE: PC FTE:	
Expense and Need	
What is the expense and need?	
Is this expense covered in the agency's indirect cost rate agreement? <input type="checkbox"/> No <input type="checkbox"/> Yes	
The following purchases require prior written approval (check all that apply):	
<input type="checkbox"/> Vehicle	<input type="checkbox"/> Capital Assets, Land, and Improvements
<input type="checkbox"/> Purchase is ≥\$5,000	<input type="checkbox"/> Other: _____
Why is it needed and what will it be used for?	
What is the life expectancy?	
What percent of time will it be used for WIC or BFPC & how was it calculated?	
What is the total cost (include taxes, shipping, installation, etc.)? \$ _____ <input type="checkbox"/> NA	
What is the total cost with the indirect rate applied (if applicable)? \$ _____ <input type="checkbox"/> NA	
Is this cost part of your cost allocation plan applied: <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> NA	
Funding	
1. Will you use current WIC funds for this expense? <input type="checkbox"/> No <input type="checkbox"/> Yes – amount: \$ _____ <input type="checkbox"/> NA	
2. Do you need additional funds for this expense? <input type="checkbox"/> No <input type="checkbox"/> Yes – amount: \$ _____ <input type="checkbox"/> NA	

Additional Information or Comments to Support Request

Use the Itemization Worksheet when there are multiple items included in this form.

Local Agency Certification

I certify that correct procurement procedures will be/were followed to determine the most responsible and responsive quote or bid. A copy of the proposed quote or bid is attached.

Printed Name and Title

Signature/eSignature

Date

FOR STATE WIC OFFICE USE ONLY

Date Received: _____ LPC/PCC: _____ Recommend Approval No Yes NA

Date Received: _____ Sup: _____ Approved/Rec Approval No Yes NA

Date Received: _____ MGT: _____ Approved No Yes NA

Date to USDA: _____ WRO Approved No Yes NA

Additional Funds Request Amount: \$ _____ Approved No Yes NA

Comments, special requirements, or reason for denial:

LPC/PCC:

_____ Date approval/denial notification sent to LA

_____ Date CAR submitted to Financial Services, Contracts Unit

_____ Date approved form sent to Financial Services, Fiscal Unit

Inventory Log

Inventoried by/date: _____ Inventoried by/date: _____ Inventoried by/date: _____

leave blank or use "NA" if not applicable

Item Description	Serial Number or VIN	Funding Source(s)	Funding Source CFDA(s)	Title Holder	Purchase Date	Purchase Price	% of WIC funds used to purchase item	Item Location	Item Use(s)	Current Condition	Current Disposition	Sale Price

Example – Inventory Log

Inventoried by/date: _____ Inventoried by/date: _____ Inventoried by/date: _____

Item Description	Serial Number VIN	Funding Source(s)	Funding Source CFDA(s)	Title Holder	Purchase Date	Purchase Price	% of WIC funds used to purchase item	Item Primary Location	Item Use(s)	Current Condition	Current Disposition	Sale Price
2017 Ford Escape	1FMAM8594LA85236	Fed WIC & XYZ local funds	10.557 & 124.12	ABC County Community Health	10/2/17	\$23,598	75.00%	1234 Main St Anytown, WA 98501	4 days/week travel between WIC clinics; 1 day/week Traveling Nurses Use	Good	Working	NA
Infant all-in-one Scale	1234vftr1TR	Fed WIC funds	10.557	ABC County Community Health	7/12/19	\$1,303	100%	5646 B Street Othertown, WA 98511	To determine weight and length of infants at 3 day/week Othertown clinic	Excellent	Working	NA
1997 Ford Escape	562FNERSYE45638RTT8	Fed WIC funds	10.557	LMZ Health District	4/04/97	\$15,096	100%	Sold on 12/15/2020	NA	NA	Sold on 12/15/2020	\$3,500

Instructions to complete the Small Purchase Process - Request for Quotes form

1. Follow Small Purchase Process policy.
2. Develop the specifications for the item needed (do not use a vendor's specifications).
3. Enter the specifications section.
4. Contact at least three (3) vendors for written quotes. Methods may be obtained but are not limited to:
 - a. Call and ask for quote. Follow-up with written quote, or;
 - b. Go online and get vendor quote. Print quote, or;
 - c. Email Small Purchase Process -Request for Quotes document requesting a quote.
5. Identify the most responsible vendor with the most responsive quote with the lowest price.
6. Document on the Small Purchase Process - Request for Quote form the rationale for choosing/not choosing each vendor. If not going with the lowest quote, explanation must be documented.
7. File the quotes to the Small Purchase Process - Request for Quote document.
8. Notifying vendors of the award decision is best practice.

Example: Small Purchase Process – Request for Quotes

Staff name & title obtaining quotes	Sally Sunshine, Purchasing Manager		
Staff name & title of awarding vendor	Jack N. Jill, Contracts Billing Manager		
Vendor selected	EFG Store		
Rationale for selection	Immediate shipping, less than \$6 from lowest price		
Notification method & date	Emailed on 2/1/21		
Item description	Laptop computer with docking station	Quantity	5
Specifications: Laptop with screen size of at least 14 inches, 4G, with webcam and microphone and docking station.			
	Vendor 1	Vendor 2	Vendor 3
Vendor name	XYZ Store	EFG Store	LMN Store
Address	NA	NA	NA
Contact name	Tom N. Jerry	Jack N. Jill	Roger Rabbit
Email address	XYZStore@email.com	EFGStore@email.com	LMNStore@email.com
Phone	1-800-1112	1-800-2221	1-800-3331
Fax	1-800-1111	1-800-2222	1-800-3333
Per unit price	\$1400 each	\$1200 each	\$1199 each
Tax	8.7%	8.7%	8.7%
Shipping	NA	NA	NA
Other charges	NA	NA	NA
Total price	\$7,609.00	\$6,522.00	\$6,516.55
Quote expiration date	30 days from 1/16/21	30 days from 1/16/21	30 days from 1/16/21
Notes	Too expensive	Ship with arrival time within 4 days of order	Shipping is 6 weeks from order

FNS Instructions Guidance to Complete FNS Instruction 813-1, Exhibits A & B

Below is guidance for completing the FNS 813-1, Exhibits A & B for purchasing or renovating or repairing real property. If you have questions, please ask your LPC for assistance.

Timeline: Submit the narrative, three (3) bids, supporting documentation, and detailed budget with the LA Worksheet for FNS Instruction 813-1 Exhibit for your project no later than June 1 of the year prior to the federal fiscal year the project is being considered for (e.g., submit on June 1, 2019 for a project in FFY 2020). Consider submitting earlier when the project needs to begin during the first quarter of the federal fiscal year. Submissions after June 1 may still be considered.

Responsibilities: It is the State WIC office's responsibility to request approval for expenditure of the funds from USDA on your behalf. It is your responsibility to research and respond to the questions in the worksheet based on your situation and needs.

Bids: Solicit for and obtain three (3) bids for your project. Bids must be itemized with labor, supply costs, indirect rate, and total estimated project cost. Attach the solicitation, each bid and supporting documentation, as needed.

Budget: Submit a detailed budget that reflects all costs for the project. Attach the budget and supporting documentation, as needed.

Narrative:

1. Local agency and site descriptions: Describe your community, agency demographics, current caseload and changes, other services your agency provides, challenges and strengths and other pertinent information about your agency.
2. Project description and purpose: Describe the project and what you want to accomplish, including the project timeline and how the project will enhance WIC services. This may include, but is not limited to, improved confidentiality, ADA compliance, and increased capacity to serve additional WIC participants.
3. Identify which contractor's bid you would like to use and the rationale of how you made this choice.

Determining the Absence of Other Options

Items 1-4: Answer these questions completely based on your inquiry into other options that would achieve your goals.

Item 5: This question is asking you to compare the project cost to the cost of renting a different location over 5 years. To assist you in determining the cost of alternative rental **space in your**

community, call your local Chamber of Commerce, economic council or property management companies to determine square footage rates.

Example: You want to renovate a building and it costs \$30,000. If you rented the same square footage facility for \$1,500 per month it would cost you \$90,000 over a 5 year period. It would be more cost effective to renovate than to rent for the space.

Item 6: This question is asking if your agency has considered expanding existing clinics or purchasing a mobile unit and what your conclusions were from that exploration.

Determining the Acceptability of a Site

Items 1-9: These questions are determining the acceptability if the project at the proposed site.

Determining WIC's Fair Share Costs

Items 1-3: If this space you are planning to purchase or renovate is shared with other programs including WIC staff who work both in WIC and other programs, you will need to calculate WIC's share of usage of the space. Refer to 2 CFR 200 for information on methods to be used in determining fair share.

Conditions for Final Approval

Item 1: Provides the submission timeline.

Item 2 (and 3): If the proposal is approved, these items are asking for assurances.

- a. If the WIC Program vacates the site, the Local Agency would contact the State WIC office for disposition instructions.
- b. If the WIC Program moves out of a privately owned, renovated space, your agency would pay back the State WIC office for the unused portion of the renovation costs. The amount of funding returned to is computed on the remaining useful life of the renovated space. Expected useful life is determined by applying the depreciation policy followed by your agency for its other assets.
- c. If your agency owns the building that WIC occupies or rents, your Administration or the landlord must agree to allow WIC to occupy the space and/or sign a lease for the time period that you would receive full value of the renovation. If not, your agency would need to pay back the State WIC office for the portion of the renovation costs based on its expected useful life. Expected useful life is determined by applying the depreciation policy followed by your agency for its other assets.

LA Worksheet for FNS Instruction 813-1 Exhibit A (Purchase)**Determining the Absence of Other Options**

1. Provide information that supports the necessity for locating the site in the proposed area.
2. Provide documentation that the local agency made an effort to locate State/local government-owned or donated space in the proposed area.
3. Provide documentation from some authority that affirms the absence of adequate rental property in the proposed area.
4. Provide evidence to establish that there is insufficient State and/or local monies available to fund the purchase of the proposed site.
5. Describe how the Local Agency has examined the cost of alternative sites in the preparation of its request to purchase the proposed site.
6. Describe how the Local Agency has explored the practicality of expanding nearby sites or purchasing a mobile site.

Determining the Acceptability of a Site

The State WIC office may need to examine a proposed site to determine its acceptability prior to final approval.

1. Is the proposed site centrally located in the area which it is intended to serve?
2. Is the proposed site located in proximity to a hospital and/or local health agency?
3. Is the proposed site located in proximity to public transportation?
4. Is the proposed site large enough to house adequate staff and equipment to accommodate the numbers of participants it is anticipated to serve?
5. Will the proposed site provide easy access for pregnant women, children, and handicapped persons?
6. Can the proposed site handle the program's automation needs (e.g., telephone lines, electrical outlets, and security)?
7. How does the projected purchase cost of the proposed site compare to the cost of equal size rental space in the proposed area (over a 5-year period of time)? The U.S.

Department of Housing and Urban Development (HUD) maintains statistics regarding the availability and cost of rental properties nationwide.

8. Can the proposed site be easily adapted/renovated into an adequate clinic setting?

Determining WIC's Fair Share of Costs

1. What programs or offices will be located in the building to be purchased?
2. What methodology is being used to calculate each party's fair share of the projected purchase cost?
3. Does the methodology assign to WIC a portion of the cost reasonable commensurate with the benefit WIC receives from use of the space?

Condition for Final Approval

1. Requests for current fiscal year funds should be submitted to the State WIC office no later than June 1 of the year prior to the federal fiscal year the project is being considered for (e.g., submit on June 1, 2019 for a project in FFY 2020). Consider submitting earlier when the project needs to begin during the first quarter of the federal fiscal year. Submissions after June 1 may still be considered.
2. Does the Local Agency agree that in the event that the WIC Program vacates the site that it will be responsible for contacting the State WIC office for disposition instructions in accordance with 2 CFR 200?

LA Worksheet for FNS Instruction 813 Exhibit A (Renovate)

Determining the Absence of Other Options

1. Has the Local Agency documented that the landlord will not renovate or repair the building as part of the rental agreement?
2. Has the Local Agency provided evidence to establish that there is insufficient Local Agency monies available to fund the cost of the proposed renovation or repair?
3. Has the Local Agency obtained at least three estimates in the process of determining the projected cost of the proposed renovation or repair?
4. Has the Local Agency examined the availability and cost of alternative sites that do not require renovation in the preparation of its request to renovate or repair a particular site?
5. How does the projected cost of renovation or repair compare to the cost of alternative rental space in the proposed area (over a 5-year period of time)? The U.S. Department of Housing and Urban Development (HUD) maintains statistics regarding the availability and cost of rental properties nationwide.

Determining the Acceptability of a Site

For large requests for renovations or repairs, The State WIC office may need to examine the site to determine its acceptability prior to final approval.

1. Is the site centrally located in the area which it is intended to serve?
2. Is the proposed site located in proximity to a hospital and/or local health agency?
3. Is the proposed site located in proximity to public transportation?
4. Is the proposed site large enough to house adequate staff and equipment to accommodate the numbers of participants it is anticipated to serve?
5. Does the site provide easy access for pregnant women, children, and handicapped persons?
6. Can the site handle the program's automation needs (e.g., telephone lines, electrical outlets, and security)?
7. Are the costs of any such upgrades included in the renovation costs?

8. Has a recent State WIC monitor or Federal Management Evaluation identified the inadequacy of the site being proposed for renovation or repair?
9. Is the proposed renovation or repair to address unsafe clinic conditions?

Determining WIC's Fair Share of Costs

1. What programs or offices will be located in the building to be renovated or repaired?
2. What methodology is being used to calculate each party's fair share of the projected renovation or repair cost?
3. Does the methodology assign to WIC a portion of the cost reasonably commensurate with the benefit WIC receives from use of the space?

Conditions for Final Approval

1. Submit the proposal to the State WIC office no later than June 1 of the year prior to the federal fiscal year the project is being considered for (e.g., submit on June 1, 2019 for a project in FFY 2020). Consider submitting earlier when the project needs to begin during the first quarter of the federal fiscal year. Submissions after June 1 may still be considered.
2. If the property is publicly owned, has the Local Agency agreed that in the event that the WIC Program vacates the facility that it will pay, from Local Agency monies, the Federal Government the non-depreciated value of the renovation/repair paid for with WIC Program funds?
3. If the property is privately owned, has the landlord agreed to extend the lease until the WIC Program has received full benefit from the renovation, or amended the lease agreement to provide for a refund to the local agency of the dollar amount representing the portion of the renovation cost from which the local agency has as yet receive no benefit?